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#### REMARKS

## INTRODUCTION

In accordance with the foregoing, claims 1, 2, 4 and 7 have been amended. Claims 1-4 and 7-9 are pending and under consideration.

## CLAIM REJECTIONS

Claims 1-4 and 7-9 were rejected under 35 USC 103(a) as being unpatentable over Nagai et al. (US 6,636,587) (hereinafter "Nagai") in view of Wood et al. (US 6,091,808) (hereinafter "Wood") and further in view of Kishinsky et al. (US 6,286,033) (hereinafter "Kishinsky").

## Claims 1-4

Amended claim 1 recites: "... wherein the main control module includes an interpretation scenario management section to select the current state conversion action and the basic telephone action for the next state in accordance with the predetermined interpretation scenario when the event is generated in the CTI module, and a state conversion section to convert the current state directly into the next state in response to the current state conversion action selected by the interpretation scenario management section, and wherein, since the CTI control functions are configured as a job unit, basic telephone actions comprising dialing, answering and hanging up are made in accordance with only one job unit without individually and repeatedly calling the CTI control functions so that actions by the talker and listener cannot intervene in between the current state and the next state." Support for this amendment may be found in at least paragraph (10051) of the specification.

The Office Action relies on Wood to show the feature of claim 1 where since the CTI control functions are configured as a job unit, basic telephone actions comprising dialing, answering and hanging up are made in accordance with only one job unit without individually and repeatedly calling the CTI control functions, and specifically relies on 5:10-5:32 of Wood.

Wood discusses that The CGI scripts 38 are software procedures that receive high-level calls from the web server 34 and translate these into lower level operations to be executed in conjunction with the cache 40 and the call control system 32, with parameters being passed to and from the CGI scripts accordingly. The call control system 32 supports a database 42, call APIs (Application Program Interfaces) 44, and a call control interface 46. The call control interface 46 is a commercially available product, such as Genesys T-Server™, that provides a network or direct interface via the path 24 to the SCI 26 of the telephone switch 16. The call

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APIs 44 communicate with the CGI scripts 38 of the web system 30 via paths 48, and translate CGI script operations into low level operations comprising calls to and from the call control interface 46 and the database 42. Thus the CGI scripts 38 and call APIs 44 simply provide successively lower level procedures or software routines for handling calls between the web page manager 36 running on the web server 34, the call control interface 46, and the database 42 and cache 40. The database 42 comprises, for example, a commercially available database manager using SQL (structured query language) in a known manner. Wood, 5:10-5:32.

It is respectfully submitted that the above noted disclosure un Wood, or any other portion of Wood, does not obviate the feature of claim 1 where the CTI control functions are configured as a job unit, and the basic telephone actions include all of dialing, answering and hanging up are made in accordance with only one job unit without individually and repeatedly calling the CTI control functions. Specifically, while Wood may arguably include dialing as a job unit, there is nothing in wood to suggest that the job unit also includes answering and hanging up. Further a telephone action does not necessarily include these actions. Further claim 1 has been amended to clarify that the basic telephone actions are made in accordance with only one job unit without individually and repeatedly calling the CTI control functions so that actions by the talker and listener cannot intervene in between the current state and the next state, which is clearly not obviated by the advertising system of Wood that relies on intervening actions.

Further, this feature of claim 1 is not discussed in Nagai or Kishinsky, taken alone or in combination.

To help clarify the features and advantages of this feature of claim 1, the following example is given using reference numerals from the specification as an example only. According to the present invention, when a talker 100 inputs the telephone number of the listener 300, the simultaneous interpretation system 500 calls the CTI control function dx\_dial from the CTI API 533, generates a DTMF signal corresponding to the telephone number of the listener 300 through the CTI board 510, and attempts to connect the call. At this time, the CTI control functions to be executed later are determined according to whether the listener 300 can talk over the telephone. That is, if the tone signals are input from the telephone line of the listener 300 through the CTI board 510, the simultaneous interpretation system recognizes that the talker 100 can talk over the telephone, and then, calls ATDX\_CPTERM as the following CTI control function and transmits ringing signals to the telephone of the listener 300. On the other hand, if a busy signal is input from the telephone line of the listener 300 through the CTI board 510, the simultaneous interpretation system recognizes that the listener 300 through the CTI board

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telephone, and then, calls dx\_play as the following control function and outputs a call connection failure message. That is, in order to perform the phone dialing action, the CTI control function, dx\_dial, should be called and then the different CTI control functions should also be called in accordance with the signals input from the CTI board 510. In view of the foregoing, claim 1 recites a structure where the CTI control functions are configured as a work unit capable of performing the basic telephone actions and are then called in order through the working section 535 to perform the basic telephone actions so that actions by the talker and listener cannot intervene in between the current state and the next state. Accordingly, the talker can freely speak by telephone with the listener who uses a different language and is remotely located.

Claims 2-4 depend on claim 1 and are therefore believed to be allowable for at least the foregoing reasons.

Withdrawal of the foregoing rejections is requested.

## Claims 7-9

Amended claim 7 recites: "...wherein, since the CTI control functions are configured as a job unit, basic telephone actions comprising dialing, answering and hanging up can be made in accordance with only one job unit without individually and repeatedly calling the CTI control functions so that actions by the talker and listener cannot intervene in between the current state and the next state."

Similar to the argument for claim 1, it is respectfully submitted that the above-noted feature of claim 7 is not discussed in the any of the relied upon references, taken alone or in combination.

Claims 8 and 9 depend on claim 7 and are therefore believed to be allowable for at least the foregoing reasons.

Withdrawal of the foregoing rejections is requested.

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# CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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